From:

O'Driscoll, Peter

Sent:

Wednesday, July 25, 2007 4:02 PM

To:

'KFeinberg@thefeinberggroup.com'; adrientes@rcn.com; gcraig@wc.com

Cc:

pieter.vantol@lovells.com; gonzalo.zeballos@lovells.com; 'lisa.fried@lovells.com'; Sills.

Robert L.

Subject:

Telenor Mobile Communications AS v. Storm LLC

Follow Up Flag: Follow up

Flag Status:

Red

## Dear Chairman Feinberg:

On June 22, you requested that the parties satisfy all outstanding invoices so that the Tribunal could release its final award. Over one month later, on July 23, in response to Telenor Mobile's offer to advance payment of Storm's unpaid invoices, you requested a response from Storm's counsel as to the status of those payments. At the end of that day, Mr. Zeballos sent an e-mail stating that he and his colleagues were seeking information from Storm concerning payment of the fees owing to members of the Tribunal and would revert to the Tribunal as soon as possible. Two days have now passed, with no indication from Storm or its counsel as to when those long overdue invoices will be paid. At this point in time, it is difficult to understand the complete absence of payment or information, other than as part of an effort to delay the issuance of the Tribunal's final award. Therefore, in accordance with your e-mail of July 23 and Article 41.4 of the UNCITRAL Arbitration Rules, we would be grateful if you would (a) provide to Mr. Sills and me by e-mail copies of the relevant unpaid invoices in respect of the fees owed to members of the Tribunal, so that Telenor Mobile can effect their prompt payment, and (b) make provision in the Tribunal's final award for Telenor Mobile's recovery from Storm of the amount advanced by Telenor Mobile to settle such invoices.

Respectfully,

Peter O'Driscoll

## PETER O'DRISCOLL

Partner
ORRICK, HERRINGTON & SUTCLIFFE TOWER 42
LEVEL 35
25 OLD BROAD STREET
LONDON EC2N 1HQ
tel +44 20 7422 4639
mobile +44 7767 348 330
fax +44 20 7628 0078
email podriscoll@orrick.com

www.orrick.com